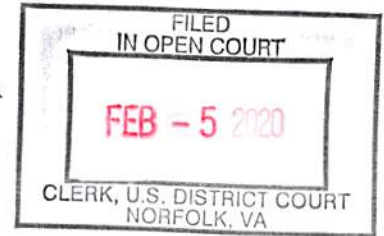


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division



IN RE:) UNDER SEAL
)
GRAND JURY PROCEEDINGS) CASE NUMBER 2:20cr 11

MOTION TO SEAL INDICTMENT IN MULTIPLE DEFENDANT CASE

The United States of America, by and through its attorneys, G. Zachary Terwilliger, United States Attorney for the Eastern District of Virginia, and Andrew Bosse, Assistant United States Attorney, pursuant to Local Criminal Rule 49(B) moves to seal the indictment and arrest warrants in this case.

Premature disclosure of the charges against the defendants could result in flight from prosecution, the destruction of or tampering with evidence, the intimidation of potential witnesses, could jeopardize the safety of the arresting officers, or otherwise could jeopardize the investigation and the ability of agents to locate and arrest the defendants. For the same reasons, sealing also is necessary to avoid notification of the existence of the arrest warrants. Another procedure will not adequately protect the needs of law enforcement at this time.

Such sealing is within the discretion of this Court and may be granted “for any legitimate prosecutorial need.” *United States v. Ramey*, 791 F.2d 317, 321 (4th Cir. 1986); *see also Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 65 (4th Cir. 1989); *In re Knight Pub. Co.*, 743 F.2d 231, 235 (4th Cir. 1984).

The United States requests that the indictment and arrest warrants remain under seal until the federal arrest of all defendants, at which time the indictment may be treated as a matter of public record. If all of the defendants are not taken into federal custody on the same date, the United States will move to unseal the indictment and arrest warrant as to each defendant who has been federally arrested, and at the initial appearance of the arrested defendant(s) or within a reasonable time thereafter will provide the Court with a redacted copy of the indictment suitable for public filing that contains redactions over the names of the co-defendant(s) not yet in federal custody.

The United States further requests that: (1) a certified copy of the indictment be provided to those law enforcement officials involved in the prosecution of this case; and (2) a copy of the sealed arrest warrants be made available to agents and Task Force Officers of the Federal Bureau of Investigation for execution.

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